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I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

Dated: February 25, 2008

Signature:


(Maureen Divito)

2008 FEB 26 AM 3: 23

Docket No.: 1801270.00125US1
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent No.: 7,203,933

Inventors: Jason Souloglou
Alasdair Rawsthorne

Filed: April 6, 2001

Title: Program Code Conversion

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RECEIVED

FEB 29 2008

OFFICE OF PETITIONS

**NOTIFICATION OF LOSS OF ENTITLEMENT TO SMALL ENTITY
STATUS UNDER 37 CFR 1.28**

Dear Sir:

Assignee, Transitive Limited, hereby notifies the Patent and Trademark Office that the claim for small entity status filed by the Applicants is hereby withdrawn.

Assignee established status as a small entity in good faith, and Assignee has paid fees to date in good faith as a small entity for this application. Assignee has recently discovered that its status as a small entity may have been established in error. Assignee believes that it may still be a small entity, that it may have been a small entity at the time it established status as a small entity, and that a change in status is unnecessary. However, in an abundance of caution, Assignee chooses to withdraw its claim for small entity status.

At or around the time of paying the issue fee for this application, the undersigned confirmed that the Assignee had a sufficiently small number of employees so that it qualified for payment of fees as a small entity. At that time, the undersigned inquired as to the existence of any agreements or licenses of any rights in the invention to any person, concern, or organization that would not qualify for small entity status. No such agreements or licenses were found. As such, Applicants filed the issue fee for this application as a small entity.

Deficiency Payment from Small to Large Entity

The undersigned recently discovered the existence of an agreement between Assignee and a third party relating to the delivery of software and services from Assignee to the third party. The third party does not qualify as a small entity, and the agreement predates the paying of the issue fee for this patent. The agreement is not fashioned as a patent license agreement, but instead as an agreement relating to the use of works received from Assignee. The agreement, however, does contain provisions that might be construed as a license of patent rights. Although Assignee believes that it may still properly qualify as a small entity even in light of this agreement, in an abundance of caution, Assignee hereby withdraws its claim for small entity status.

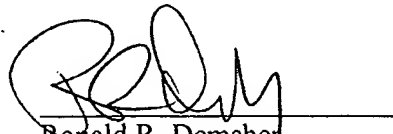
The itemization of the deficiency payment as required by 37 CFR 1.28(c)(2) is set forth below.

Fee Type	SE Fee Paid	Current LE Fee	Deficiency
Utility Issue Fee	\$700.00	\$1440.00	\$740.00
Publication fee	\$300.00	\$300.00	0
		Total Deficiency	\$740.00

Applicant believes a payment in the amount of \$740 is due with this response. Please charge our Deposit Account No. 08-0219, under Order No. 1801270.00125US1, from which the undersigned is authorized to draw. If any additional fee is due, please charge this same deposit account.

Respectfully submitted,

Dated: February 25, 2008



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